

# Exhibit 3

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UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA  
MISSOULA DIVISION

TANYA GERSH,

*Plaintiff,*

v.

ANDREW ANGLIN,

*Defendant.*

Case No. 9:17-cv-00050-DLC-KLD

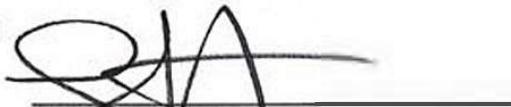
**NOTICE OF FILING OF  
AFFIDAVIT OF SARA E.  
HERSHMAN REGARDING  
ATTORNEYS' FEES**

Plaintiff Tanya Gersh by and through her counsel of record, Paul, Weiss, Rifkind, Wharton & Garrison LLP, files this Notice of Filing of Affidavit of Sara E. Hershman Regarding Attorneys' Fees. In accordance with this Court's Order of February 9, 2021 (ECF 232), the undersigned counsel submits an affidavit, attached hereto, detailing known fees and costs associated with Plaintiff's Motion to Compel Defendant to Respond to Plaintiff's Post-Judgment Discovery Requests (ECF 228).

Dated this 19th day of February, 2021

**PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP**

BY:



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DISTRICT OF MONTANA  
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*Plaintiff,*

v.

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*Defendant.*

Case No. 9:17-cv-00050-DLC-KLD

**AFFIDAVIT OF SARA E.  
HERSHMAN REGARDING  
ATTORNEYS' FEES**

I, Sara E. Hershman, hereby swear and affirm the information contained herein is true and accurate to the best of my knowledge.

1. This affidavit is being submitted in accordance with the Court's Order of February 9, 2021 granting subject to certain modifications Plaintiff's Motion to Compel Defendant Andrew Anglin to Respond to Plaintiff's Post-Judgment Discovery Requests ("Order"). (*See* ECF 232 at 1). The Court ordered that counsel for Plaintiff and Judgment Creditor Tanya Gersh "file an affidavit of counsel that sets forth the reasonable expenses, including attorney fees, that were incurred in the presentation of [Plaintiff's] motion to compel." (*Id.* at 15).

2. Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul, Weiss") has been retained by Plaintiff in connection with the above captioned case.

3. I am an associate at Paul, Weiss. My hourly rate is \$980.

4. In preparation for submission of this affidavit, I have reviewed the billing entries for time spent in relation to preparing and filing Plaintiff's Motion to Compel Defendant to Respond to Plaintiff's Post-Judgment Discovery Requests (ECF 228) and Brief in Support (ECF 229) ("Motion to Compel").

5. Attached hereto as Exhibit A is a true and correct copy of time entries which were exported from Paul, Weiss's billing system in spreadsheet form.

6. The spreadsheet includes only those time entries related to preparing Plaintiff's Motion to Compel. All unrelated time entries have been redacted. The spreadsheet does not include time spent during counsels' attempts to meet and confer with the Defendant.

7. The spreadsheet shows the date the time was billed, the timekeeper's name, the billed amount for the time spent, the number of billable hours, and a descriptive time narrative.

8. This affidavit excludes time billed by Daniel J. Kramer and other associates and partners at Paul, Weiss, and time billed by Beth Littrell of the Southern Poverty Law Center and John Morrison of Morrison, Sherwood, Wilson & Deola PLLP, for preparing the Motion to Compel.

9. As shown in the attached spreadsheet, I billed 8.4 hours.

10. Accordingly, the attorneys' fees involved in bringing the Motion to Compel totaled \$8,232.00.

DATED this 19th day of February, 2021

**PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP**

BY:

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# Exhibit A

Run Date & Time: 02/19/21 12:27:11

Work Date From : 09/01/20 Thru : 01/31/21

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Client: 095544 Southern Poverty Law Center

Resp Prtnrs: DJK

### **Proforma:**

(00077)

Matter: 00001 Southern Poverty Law Center - Tanya Gersh

Bill Frg: T Class: 9999 Status: NB

Run Date &amp; Time: 02/19/21 12:27:11

Work Date From : 09/01/20 Thru : 01/31/21

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Resp Ptnrs: DJK

Proforma:

(00077)

Matter: 00001 Southern Poverty Law Center - Tanya Gersh

Bill Frq: T Class: 9999 Status: NB

Employee Name	A L L   T I M E   S U M M A R Y			Hours
	Off	Dp	Position	

Hershman, Sara	NY Lit	ASSOCIATE	[REDACTED]	[REDACTED]	[REDACTED]
			[REDACTED]		

Employee Name	A L L   T I M E   D E T A I L			Hours
	Dept	Position	Work Date Description	

12/02/20	Review and prepare papers for filing.	1.00
12/03/20	Review revised papers for filing and discuss with M. Triana; review motion to compel papers.	2.70
12/04/20	Review motion to compel and accompanying papers and prepare for filing.	1.50
	[REDACTED]	[REDACTED]
12/08/20	Review motion to compel papers and discuss with E. Strong about same.	1.20
12/09/20	Communicate with team and co-counsel regarding next steps.	0.80

Run Date & Time: 02/19/21 12:27:11

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